help restore the Sea. But that will not be addressed in the EIR the way it's set up. P3-24

The point is that the restoration plan is right in the middle of things and the EIR doesn't address it. If the IID exercises HCP-2 without the restoration program, the tailwater will be needed to help maintain the elevation of the Sea so as not to hasten the demise of the Sea. When the Sea finally starts to die, what will the status of that tailwater be? The EIR doesn't address that. P3-25

So the IID could keep the Sea going for a while if they're going to HCP-2, but where are we going to be when the Sea starts to die? P3-26

The EIR says the baseline elevation of the Sea will lower seven feet during a period of time. That is a reduction of almost 100,000 acre-feet a year in the flow of the Sea.

That number is very important when it comes to working out a restoration program. 100,000 acre-feet of water could be worth $30 million a year in the cost of restoring the Sea. That means if you're short 100,000 and you want to put dikes out there to compensate for the shortage of water, that that could cost you $30 million a year. P3-27

So it's very important that that number is -- okay.

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Response to Comment P3-25

See Master Responses on *Biology—Approach to Salton Sea Habitat Conservation Strategy* and *Other—Relationship Between the Proposed Project and Salton Sea Restoration Project* in Section 3 of this Final EIR/EIS.

Response to Comment P3-26

See Master Responses on *Biology—Approach to Salton Sea Habitat Conservation Strategy* and *Air Quality—Salton Sea Air Quality Monitoring and Mitigation Plan* in Section 3 of this Final EIR/EIS.

Response to Comment P3-27

See Master Responses on *Biology—Approach to Salton Sea Habitat Conservation Strategy* and *Other—Relationship Between the Proposed Project and Salton Sea Restoration Project* in Section 3 of this Final EIR/EIS.

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P3-28

P3-29

The next issue is the third-party impact, and the EIR says that if we fallow land, that it's going to be done on a proportion basis -- or proportional basis of what the crops are now, and we think that's not true.

We think that -- everybody I've talked to in the farm business doesn't think that the produce crops will be idle. Just because there's less land to farm doesn't mean the flat the crops with low values.

I guess I can stop here. There's -- I'll turn this -- have I still got a little time?

MR. ELLIS: Ten seconds.

MR. COX: Another issue not covered in the EIR is the amount of fish that would have to be raised on an annual basis when the Sea gets salty enough that the fish cannot reproduce. I've tried to get that figure and I've heard anywhere from 80 million pounds to 12 million pounds, and I have got some figures. And George Ray says they're probably higher than that because of problems he's talking about. But a dollar a pound is what they're doing for commercial fish. And so you can see that it's a substantial cost.

I'm going to close here. This is an extremely complex issue and I don't see how the IID can proceed without getting indemnified and fully protected from unknown problems.

Thank you very much.

24

Response to Comment P3-28

Refer to the Master Response on *Socioeconomics—Crop Type Assumptions for Socioeconomic Analysis of Fallowing* in Section 3 of this Final EIR/EIS.

Response to Comment P3-29

Approach 1 of the Salton Sea Conservation Strategy in the Draft HCP, which included stocking fish into the Salton Sea and subsequently into constructed ponds, has been eliminated from consideration.

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MS. CARD: Thank you.

Larry Gilbert. Then Wes Blakely.

MR. GILBERT: I'm giving you a copy of what most of my comments will be and a couple others to go along with that. My name is Larry Gilbert. I'm at 945 East Worthington Road in Imperial. I have a farm in that area and I'm a lifelong resident of the valley and I'm concerned about what happens to the valley and the economy down here.

I want to address mostly the economic stimulation that is supposed to happen to the valley as a result of this transfer, and I think that the amount of economic stimulation for the option of conserve by unfarmed irrigation system improvements and water delivery system improvements, and I'm referring to section 3.14, page 17, is grossly understated.

P3-30

There's four primary reasons why we're in this transfer business. The unit Bureau of Reclamation of your agency has threatened us saying that we need to use our water efficiently and then claiming that we're not doing that, and that if we don't, action would be taken against us. Coachella Valley Water District has been for decades claiming we're wasting water and said that if we won't use it efficiently, they'll take it away from us. The State Board beginning in 1980, Water Resources Control Board, has indicated that they thought our efficiency must be improved.

P3-31

25

Response to Comment P3-30

The commenter indicates that the Draft EIR/EIS understates the economic stimulation that the Project will provide. The socioeconomic impact estimates presented in the Draft EIR/EIS are based on generally accepted practices in the Imperial Valley. Consistent with the methodology used throughout the impact analyses in the Draft EIR/EIS, a conservative approach to the selection of modeling assumptions was followed; thus, the modeling assumptions tend to understate potential beneficial effects and overstate potential adverse effects.

Response to Comment P3-31

Comment noted.

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Our water rights basically are being challenged and our reasonableness of use is being questioned. At the urging of the State Board the IID had worked out a plan whereby San Diego County Water Authority would provide the needed funds to IID to improve our irrigation efficiency and then they would get the water estimated from that.

P3-31

It's expected, if not demanded from us, that we improve our water-use efficiency and that we transfer new water, not paper water, as a result of that efficiency improvement. Now, if the IID actually uses the 60 to $90 million that is expected to come in from this project after it gets ripped up, to construct conservation facilities and implement conservation maintenance, the increase in the valley's economy should far exceed the $55 million that's estimated in EIR.

P3-32

It appears that the economic analysis assumes a conservation plan similar to the one the IID planned in November. Now, that plan proposes to give 85 percent of the revenues to farm owners and about 40 percent of that would go to residents from outside of this area, and there would be no efficiency standard connected with that.

Now, as far as the landowners are concerned with that plan, they're simply being paid to farm less or fallow the ground. And if that were done, of course the local economy would be little stimulated. But neither would any

P3-33

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Response to Comment P3-32

Refer to the response to Comment P3-30.

Response to Comment P3-33

The details of the conservation program are not available at this time (refer to response to Comment P3-3). The socioeconomic impact analysis uses the installation of pumpback tailwater recovery systems as a representative on-farm irrigation system improvement for the purposes of estimating impacts to the regional economy. Planning level estimates for the additional labor costs required to operate the IID water delivery system improvements are included in the impact assessment presented in the Socioeconomics section of the Draft EIR/EIS (Section 3.14).

The Draft EIR/EIS acknowledges that on-farm or water delivery system conservation measures will generate economic activity and that fallowing will have adverse socioeconomic effects. It is also acknowledged that fallowing will not result in irrigation efficiencies; however, it is appropriate to consider fallowing in the Draft EIR/EIS because it would reduce the impacts of the Project on the Salton Sea and adjacent habitat areas.

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wet water be produced of significance.

If the IID is going to transfer new water obtained by reducing its losses instead of paper water obtained by fallowing, the 60 to $90 million of anticipated revenue will have to be spent on conservation maintenance. That would undoubtedly include many things like laser leveling to zero or minimal side slope on our fields, improved distribution methods for furrow irrigation, better irrigation management, reduce main slopes on the ends of our fields and other things of that nature.

Real conservation would also involve obtaining information on the quantity of tailwater that we have and that would likely include meters. That involves a lot of labor and materials and that would all be obtained locally.

And I could go into detail about other things, but let me mention one other item. An improved IID delivery system would require considerable maintenance. This would be a system that would be automated and not just one that would sit there, and this would require labor and supplies and materials obtained locally as would any maintenance to unfarmed tailwater return systems.

P3-33

P3-34

I have submitted the Farm Bureau Conservation Plan with a sample of how the transfer revenues might be used. And I would hope that that could be used as an example to recalculate the amount of benefit that could be accrued to

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Response to Comment P3-34

Comment noted.

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P3-34 the local economy if the water is conserved the way it should be.

P3-35 It strongly appears that the amount of stimulation to the local economy that would result from 60 to $90 million of anticipated revenue spent locally on conservation maintenance would far exceed the $55 million that's stated in the EIR.

P3-36 A couple of other minor points. The cost of lateral interceptors is specified on page G-8. The initial capital cost per acre-foot conserved is listed at $495 per acre-foot. This number is obviously in error. If it was used in the economic analysis it should be corrected.

P3-37 And also the value of hay and pasture on page G-13, the estimated gross revenue per acre for hay and pasture is listed as only $444 per acre. If this is referring to alfalfa, Sudan grass or Bermuda grass, the actual amount should be about double that.

Thank you very much for the opportunity to speak.

MS. CARD: Thank you.

Wes Blakely.

MR. BLAKELY: My name is Wes Blakely. I'm a farmer here locally and I'm representing the water community of the El Centro Chamber of Commerce and Visitors Bureau.

P3-38 We recently adopted this position statement regarding the EIR/EIS. It is imperative that all

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Response to Comment P3-35

Refer to response to Comment P3-30.

Response to Comment P3-36

The sentence containing the reference to a $495 per AF cost in Appendix G has been corrected. This change is indicated in this Final EIR/EIS in subsection Appendix G in Section 4.2, Text Revisions. The correct costs were used in the analysis calculations presented in the Draft EIR/EIS.

Response to Comment P3-37

The per acre value of production for hay and pasture of $444 used in the analysis represents the weighted average value of irrigated pasture in addition to the crops mentioned by the commenter. The individual crop acreage and value of production information used to calculate this value is derived from Imperial County Agricultural Commissioner's data for the years 1987 to 1999. The table below presents the crops included in each of the IMPLAN crop categories used in the analysis along with the assumed crop acreage, crop specific average value of production, and the IMPLAN category weighted average value of production.

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Response to Comment P3-37 continued: IMPLAN Sector County Agricultural Commissioner Data

	Crop Name	Avg. Harvested Acreage (1987 to 1998)	Avg. Annual Value of Production (1987 to 1998)	Avg. Annual Value of Production ($ per Acre)	Weighted Avg. Annual Value of Production ($ per Acre)
Cotton(1)	Cottonseed	10,597	1,450,583	137	1,003
	Cotton Lint Unspecified	11,727	10,157,833	866	
Food Grain	Corn Grain	372	126,000	339	425
	Barley Unspecified	484	100,000	207	
	Wheat Seed	2,555	1,073,333	420	
	Field Crops Seed Misc.	7,421	4,667,750	629	
	Field Crops Unspecified	16,229	5,989,250	369	
	Wheat All	71,208	29,809,333	419	
Grass Seed	Seed Bermuda Grass	18,119	12,735,416	703	638
	Seed Alfalfa	13,481	7,421,083	550	
Hay and Pasture	Pasture Forage Misc.	17,691	688,500	39	444
	Hay Other Unspecified	28,344	11,804,000	416	
	Hay Sudan	65,076	34,320,636	527	
	Pasture Irrigated	145,878	7,082,083	49	
	Hay Alfalfa	182,851	140,710,916	770	
Sugar Beets	Sugar Beets	34,886	42,789,000	1,227	1,227
Vegetables	Squash	315	907,000	2,879	3,400
	Melons Unspecified	730	1,475,833	2,021	
	Tomatoes Fresh Market	925	7,155,000	7,735	
	Cabbage Head	985	2,711,833	2,752	
	Salad Greens Nec.	1,109	6,005,000	5,415	
	Melons Honeydew	1,946	5,458,083	2,805	
	Potatoes Irish All	2,454	10,149,000	4,136	
	Melons Watermelon	3,037	7,682,750	2,530	
	Seed Veg & Vinecrop	3,169	8,098,583	2,555	
	Tomatoes Processing	4,000	7,002,666	1,751	
	Corn Sweet All	4,428	9,646,571	2,179	
	Asparagus Unspecified	4,882	22,790,583	4,669	
	Lettuce Leaf	5,525	29,467,181	5,333	
	Cauliflower Unspecified	5,640	15,064,000	2,671	
	Vegetables Unspecified	5,648	19,251,500	3,409	
	Cauliflower Fresh Market	5,776	18,889,181	3,270	
	Tomatoes Unspecified	6,753	37,094,000	5,493	
	Broccoli Unspecified	7,874	19,672,000	2,498	
	Broccoli Fresh Market	8,393	25,832,000	3,078	
	Carrots Processing	9,686	11,398,285	1,177	
	Onions	10,230	29,656,000	2,899	
	Carrots Fresh Market	11,292	52,691,666	4,666	
	CARROTS UNSPECIFIED	13,226	72,729,333	5,499	
	MELONS CANTALOUPE	21,529	52,668,750	2,446	
	LETTUCE HEAD	27,475	94,449,916	3,438	

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Note: (1) The value of production used for cotton is not a weighted average but the sum of cottonseed and cotton lint.

Response to Comment P3-38

The IID Board will consider whether to implement socioeconomic mitigation measures when it considers whether to approve the Proposed Project or an alternative to the Proposed Project.

P3-38

third-party impacts identified in the EIR/EIS be fully mitigated in the final agreement to transfer water.

P3-39

Our support is also conditioned on the restoration of the Salton Sea being totally funded and implemented by the State of California and the federal government.

P3-40

While we recognize the linkage that exists between Salton Sea restoration and the proposed ag-to-urban water transfer, we do not believe the economic future of the region and indeed the continued viability of the Imperial Valley should be held hostage to the fate of the Salton Sea.

P3-41

For these reasons we call on the State of California and the United States government to commit such resources as may be necessary to save the Salton Sea and to allow the scheduled water transfer to proceed without this particular environment and financial encumbrance.

The El Centro Chamber of Commerce and Visitors Bureau is generally inclined to support the restoration of the Salton Sea if, in the view of the state and federal officials, such restoration is scientifically and financially feasible. But the Imperial Valley cannot reasonably be expected to shoulder this responsibility and the water transfer should not be delayed while an appropriate environmental remedy for the Salton Sea is being formulated.

Thank you.

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Response to Comment P3-39

Comment noted.

Response to Comment P3-40

Refer to the Master Response on *Other—Relationship Between the Proposed Project and the Salton Sea Restoration Project* in Section 3 of this Final EIR/EIS.

Response to Comment P3-41

Comment noted.

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MS. CARD: Thank you.

Are there any additional speaker cards that have been filled out? Is there anyone in the audience who would like to step forward and make a statement?

We'd like to take a 10-minute recess and allow folks to mill around a little bit, ask questions of the staff who are available to discuss the draft EIR/EIS. then a little after 6:00 o'clock we'll go back on the record for any additional statements.

Thank you.

(Recess taken.)

MS. CARD: Please be seated. Thank you. It's just before 6:10. We'll go back on the record now. Is there anyone in the audience tonight who has not spoken who would like an opportunity to provide a statement?

Well, it appears that there are no new presenters. And in that event we will open up to those who have already provided a statement for an additional five-minute statement.

If you would like to step up and state your name, Mr. Rossmann.

MR. ROSSMANN: So you're treating me the way I think the farmers around here want to be treated. You can take a little bit at a time, not too much. Of course, the question is how much are you going to get total?